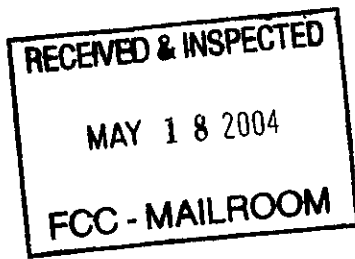


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The House of Brick

Tuesday, May 11, 2004

Federal Communications Commission
445 12th Street SW, Room 6C-447
Washington, DC 20554

Re: Docket Number CC-98-67 and CG 03-123

To FCC:

I, as a consumer observer, attended the FCC Summit meeting on Friday, May 7 with Mr. Snowden in charge. The group was composed mostly of leaders from the deaf and hard of hearing community. There was considerable discussion of VRS.

When it comes to determining Mandatory standards and services, please consider the broadband speed. As you probably know, download and upload speeds must be at least 256 bkps for visual clarity of the signer so that jerky movements do not occur. Most DSL providers meet the download speed requirements, but fail to meet the minimum required for upload speed. As far as I know, cable modem broadband providers do meet the minimum requirements for both download and upload. I live in Philadelphia, and for a variety of reasons I prefer the DSL service provided by Earthlink to the cable modem broadband service offered by Comcast, but Earthlink's upload speed is about 100 bkps. I checked with Verizon and their DSL upload and download speeds for residential customers are similar to that of Earthlink. In order to get the higher upload speed of 384 bkps, I would have to subscribe at business rates which would cost an extra \$20 to \$30 per month. Since different broadband providers provide different levels of services, such as nationwide local access, quality of tech support, upload and download speeds, etc. I feel that all broadband providers for deaf and hard of hearing customers should meet the mandatory requirements so that the individual deaf and hard of hearing consumer can pick the provider that best meets his needs and the cost of providing broadband service so that the VRS is effective should be at residential rates.

Another area of concern is the cost of the equipment and broadband service to the deaf and hard of hearing consumers with poor command of the English language. With the fast growth of telecommunications, more and more deaf and hard of hearing people are unable to afford the monthly cost of broadband services. This group of people with limited income have the greatest need for VRS. These people with limited income as a group have minimal English skills or very poor command of the English language and find existing technology which relies heavily on written English and being able to read English, difficult at best, requiring that the English be adulterated to the simplest level

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possible. The MD TRS is one of the few, if not only state, that provides 24/7 interpreters on the relay floor to translate "typed" ASL (American Sign Language) into meaningful English and conversely interpret spoken English into ASL. As a former Chairperson of the PA TRS (Telecommunications Relay Service) Advisory Board for many years, I was unable to convince the representatives of AT&T, the PA provider of TRS, to provide similar services. Their argument was that the current FCC rules and regulations require word for word translation. Now the growth of VRS provides this group of deaf and hard of people with limited income and poor mastery of the English language an opportunity to express themselves in the language with which they are most comfortable, ASL, and to receive communication from one speaking in English via an interpreter using the person's native language, ASL. In your deliberations regarding the VRS, please consider how the VRS can be made affordable to this group of people for whom accessible communication in an oral, English speaking world has been so limited, and yet is so vital in their being inclusive in our American society.

In summary, I ask that you consider:

- 1) Making broadband upload and download speeds for VRS users be at a speed for smooth functioning and at rates similar to that charged for residential broadband customers that do not need the faster upload speeds.
- 2) Consider how to make the VRS technology with the required VRS broadband speeds available to those deaf and hard of hearing people with limited income, who, as a group, have the greatest need for the VRS.

In closing, I request that this letter be put in the formal file on relay services, Docket Number CC-98-67 and CG 03-123.

Sincerely,



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